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August 1, 2023

BY ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: Proskauer Rose LLP v. O'Brien, No. 1:22-CV-10918-AT (S.D.N.Y.)

Dear Judge Torres,

We represent Plaintiff Proskauer Rose LLP ("Proskauer") in the above-referenced action and write on behalf of both parties. In order to accommodate competing obligations on both sides, the parties respectfully request a brief extension of two specific deadlines in this case, as follows:

- The current deadline for Defendant Jonathan O'Brien to file his Answer or otherwise respond to the Amended Complaint is August 7, 2023 [ECF No. 96]. The parties request to adjourn this deadline by three weeks, to August 28, 2023.
- The current deadline for Proskauer to respond to Defendant's interrogatory requiring identification of trade secrets (¶ 6(b)(i), Dkt. 85) is September 7, 2023 [ECF No. 96]. The parties request to adjourn this deadline by three weeks, to September 28, 2023.

The parties are not requesting adjournment of any other deadlines. The parties have not previously requested an extension for these deadlines, except that the parties submitted a revised Case Management Order effecting all deadlines in the case, which was granted on July 3, 2023, following the expiration of a temporary stay. [ECF No. 97].

We appreciate the Court's attention to this matter.

Respectfully submitted,
DEBEVOISE & PLIMPTON LLP

/s/ Jyotin Hamid
Jyotin Hamid

cc: Counsel of Record (via ECF)